

EXHIBIT J

1 if anything, of the chief of police? You get budget
2 calls for 36 sergeants' positions and you make 38
3 sergeants.

4 A. Right.

5 Q. Is there any limitation, any constraint
6 whatsoever?

7 A. In the past we overpromoted essentially just by
8 looking at the budget and making sure that we could
9 afford to do it, and asking for additional reqs and
10 you just, you would tell HR, "This requisition is
11 going to be in lieu of a patrol officer. We're going
12 to make it a sergeant," was sort of the --

13 Q. And HR didn't have to clear with anybody in
14 charge of budgeting inside the county?

15 A. I don't know what HR did. I don't. I called
16 Pat Lutz DiIenno and said, "I want to promote the 38
17 sergeants." "Okay, do you have open positions?"
18 "Yes, I do." "Okay."

19 Q. But at some level you didn't. You only had --

20 A. I had open patrol officer positions.

21 Q. Oh. So you say yes, you took from her
22 question, "Do you have open positions," "Yes, I have
23 those positions."

24 A. Yes.

